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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

July 19, 2022

BY EMAIL

The Hon. Ona T. Wang
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Ethan Nguyen and Andre Llacuna, 22 Mag. 2478

Dear Judge Wang:

The Government writes, with consent of defendant Ethan Nguyen and defendant Andre Llacuna, to request an extension *sine die* to review the electronic devices listed below (the "Electronic Devices"), which were seized pursuant to a judicially-authorized search warrant in the Central District of California and attached hereto as Exhibit A (the "California Warrant"). The Electronic Devices were seized on March 24, 2022. Pursuant to the California Warrant, law enforcement is required to search the Electronic Devices within 120 days, which expires on July 22, 2022. Both defendants have submitted applications to the Youth Adult Opportunity Program ("YAOP"), which remain pending. As a result of the pending YAOP applications and pre-indictment plea negotiations, the Government agreed to stop the Electronic Devices review. The Electronic Devices are in the Southern District of New York. The Government conferred with defense counsel prior to this request and neither counsel objects.

Seized Electronic Devices

SCIZCU EICCH OIRC DEVICES			
Device Description	Qty	Owner	
Ledger Nano X w/Seeds			
3760027781517			
3760027781500		LLACUNA,	
3760027781500	3	ANDRE	
		LLACUNA,	
Ledger Nano S w/ Seeds	2	ANDRE	
Green Sandisk Thumbdrive		LLACUNA,	
Serial No. BN200657706W	1	ANDRE	
Apple MacBook Pro A1989		LLACUNA,	
S/N C02Y343CJHC9 + powercord	1	ANDRE	

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Mobile Phone: Supreme (Red in Color)		
IMEI 3588851000091448 and S/N		LLACUNA,
2070018019039097	1	ANDRE
Mobile Phone: Apple iPhone 11		LLACUNA,
IMEI 353971107339298 and S/N DNPZMB90N72Q	1	ANDRE
		LLACUNA,
SanDisk Thumbdrive 64 GB S/N BN200657706W	1	ANDRE
Western Digital SSD Model #W03NCE0010PNC-		
WRSN		LLACUNA,
S/N 214859801096	1	ANDRE
Lian Li Razer Tower, Samsung HD 980PROMZ-		
V8P2T0		NGUYEN,
S/N S6B0NC0RA07689L	1	ETHAN

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/
Danielle Kudla

Assistant United States Attorneys (212) 637-2304

CC: Edward Sapone, Esq.

Counsel for Ethan Nguyen

Aaron Mysliwiec Counsel for Andre Llacuna

Application **GRANTED**.

SO ORDERED.

The Hon. Ona T. Wang United States Magistrate Judge 07/20/2022